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December 23, 2021

Via ECF

The Honorable Judge John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **Garcia et al v. Moncon, Inc. et al**
20-cv-05024 (JPC)

Dear Judge Cronan:

We represent the Plaintiffs in the above-referenced matter and we submit this letter motion jointly with Defendants to respectfully request an extension of time to file pre-trial documents in this matter. This is the first request for an extension of time to file pre-trial documents, which are presently due on December 24, 2021.

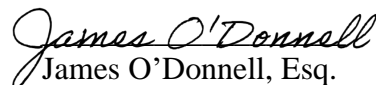
Due to: i) the recent spike in COVID-19 cases affecting Plaintiffs' and Defendants' counsel's offices and in light of the upcoming holidays, and ii) Defendants preparing for a lengthy arbitration scheduled for next month, we respectfully request an additional forty-five (45) days to file the pre-trial documents in this matter. If this request is granted, the Parties can file the pre-trial documents on or before February 7, 2022.

The parties do not believe that this request for an extension of time to file will affect any other scheduled dates or deadlines. Pursuant to Court Order, the parties filed a letter on November 9, 2021 [Dkt. No. 36] proposing final trial dates of June 6, 2022, June 20, 2022, and September 19, 2022. At this time, we are still awaiting further information from the Court as to whether the trial will proceed on any of the proposed dates.

We thank Your Honor for his consideration on this matter and remain available to provide any additional information.


The parties shall file the proposed joint pretrial order and all other required pretrial filings, including any motions *in limine* in accordance with 7.B-C of the Court's Individual Rules and Practices in Civil Cases by February 7, 2022.

Respectfully submitted,


James O'Donnell, Esq.

SO ORDERED.

Date: December 24, 2021
New York, New York


JOHN P. CRONAN
United States District Judge

CC: Defendants' counsel (via ECF)